

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

<p>CLASSIC AIR CHARTER, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>THE UNITED STATES,</p> <p style="text-align: center;">Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. <u>25-286 C</u></p>
---	---	---------------------------------

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff, Classic Air Charter, Inc. (“CAC”), hereby respectfully requests leave of the Court to file under seal the Complaint (“Complaint”) and the Proposed Redacted Version of the Complaint (“Proposed Redacted Complaint”) that accompany this motion. The Complaint (and the Exhibits thereto) contains confidential and proprietary information, the disclosure of which is likely to cause serious competitive harm to CAC. Likewise, until it is agreed by the parties to be a final redacted document suitable for public release, the Proposed Redacted Complaint similarly runs the risk of containing confidential and proprietary information, the disclosure of which is likely to cause serious competitive harm to CAC. Accordingly, leave to file the Complaint and Proposed Redacted Complaint under seal is necessary to safeguard against the disclosure of confidential and proprietary information.

Additionally, because CAC has previously protested this procurement at the Government Accountability Office (“GAO”), certain information and material that is likely to be at issue in this matter before the Court may be covered by a GAO protective order. The GAO’s protective order requires that any party using information protected by a GAO protective order in a

proceeding before the U.S. Court of Federal Claims file the material under seal and request that the Court issue its own protective order to cover the protected material.

Please note that CAC is filing herewith a Motion for Protective Order requesting that the Court issue a standard Protective Order in this matter consistent with U.S. Court of Federal Claims Form 8 (Protective Order in Procurement Protest Cases) to safeguard the proprietary and confidential information of the parties to this litigation that is likely to be disclosed orally and/or in writing during this matter.

February 18, 2025

Respectfully submitted,

/s/Aron C. Beezley

Aron C. Beezley

Bradley Arant Boult Cummings LLP

1615 L Street, N.W., Suite 1350

Washington, D.C. 20036

Email: abeezley@bradley.com

Tel.: (202) 719-8254

Attorney of Record for Classic Air Charter, Inc.

Of Counsel:

Gabrielle A. Sprio

Bradley Arant Boult Cummings LLP